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The Honorable Catherine C. Blake
United States District Judge
U. S. District Court for the District of Maryland
U.S. Courthouse
101 West Lombard Street
Baltimore, MD 21201

**RE: *American Sugar Refining Co., Inc. v. M/V ALIANA*
PRINCESS; Civil Action No.: CCB-03-CV-329**

Dear Judge Blake:

This letter is a joint request for further extension of deadlines under the Scheduling Order.

This case concerns damage to one of Plaintiff's cranes and additional damages related to the loss of use of that crane for a period of time.

Counsel acknowledge that extensions have been jointly requested on two prior occasions, however, as this litigation in effect began simultaneously with the occurrence, as the vessel was arrested to commence the case, a lengthy period of time was required up front for the Plaintiff to ascertain the extent of its damages.

Damages have now been finalized and Plaintiff has provided the documents requested by Defendant. However, Defendant's counsel has not had the opportunity to review the new documents provided due to his involvement in the *Kastner* case, recently settled, but scheduled for a month long trial before Judge Nickerson.

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Counsel still feel strongly that the case can be resolved without the necessity for formal discovery and the necessity to obtain experts. As the deadline for designating experts is currently February 24, 2004, We would respectfully request that the date set forth in the Court's paperless Order approving counsel's request for revisions to the Scheduling Order dated November 24, 2003, be moved forward for 45 days as follows:

1. Plaintiff's Rule 26(a)(2) Disclosures re: experts – April 7, 2004;
2. Defendant's Rule 26(a)(2) Disclosures re: experts – May 7, 2004;
3. Plaintiff's Rebuttal Rule 26(a)(2) Disclosures re: experts – May 21, 2004;
4. Rule 26(a)(2) Supplementation of Disclosures and responses – May 21, 2004;
5. Discovery deadline; submission of Status Report – June 11, 2004;
6. Request for Admission – June 18, 2004; and
7. Dispositive Pretrial Motions deadline – July 9, 2004.

All other provisions to the Court's Scheduling Order remain the same. Thank you for your consideration.

Very truly yours,
/S/
James D. Skeen

cc: Robert B. Hopkins, Esq.
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Jeffrey J. Asperger, Esq.